



THE CITY OF NEW YORK
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Via ECF

The Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **Nampiarampil v. N.Y.C. Campaign Fin. Bd., et al.**
No. 23 CV 6391 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the office of the Acting Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for Defendants in the above-referenced action. With Plaintiff's consent, I write to respectfully request an adjournment of the pre-motion conference currently scheduled for July 11, 2024, at 2:30 pm.

As the Court will recall, Defendants filed a pre-motion letter in anticipation of a motion to dismiss the First Amended Complaint in this action. (ECF No. 48.) Thereafter, Plaintiff filed an opposition to this pre-motion letter, and the Court scheduled the aforementioned pre-motion conference. (ECF Nos. 49-50.) Unfortunately, because I inadvertently calendared the pre-motion conference as a deadline on the 11th rather than an appearance at a particular time, I now realize that I simultaneously am scheduled to defend a deposition (in the Poux case also presently before Your Honor) on the 11th in the afternoon. I apologize for this error on my part.

In light of this scheduling conflict, I respectfully request that the Court adjourn the pre-motion conference. I have conferred with Plaintiff, and the parties are available in the afternoons of July 22, 24, and 25, 2024. However, on the 24th, I have an in-person appearance in Bronx County Supreme Court that I anticipate will conclude at 1 pm. This is Defendants' first request for an extension of the pre-motion conference. This request is submitted several hours past the 48-hour deadline in the Court's Individual Rules due to the fact that I wished to ensure

that the parties had mutually acceptable dates to offer to the Court for an adjournment. Of course, should the parties' proposed dates be unacceptable to the Court, I am happy to confer with the Court's deputy or another member of Chambers staff to determine an appropriate date.

I thank the Court for its consideration of this application.

Respectfully yours,

/s/ David S. Thayer

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